

1 ERIK B. LEVIN
2 CABN 208274
3 JOSHUA L. DRATEL
4 *Pro Hac Vice*
5 LAW OFFICE OF ERIK B. LEVIN
6 2001 Stuart Street
7 Berkeley, California 94703
8 Telephone (510) 978-4778
9 Facsimile (510) 978-4422
erik@erikblevin.com

10 Counsel for Adam Shafi
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15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,) NO. 15 Cr. 582 WHO
18 Plaintiff,) STIPULATED MOTION AND ORDER
19 v.) SHORTENING TIME FOR MOTION
20 ADAM SHAFI,) FOR REVIEW OF DETENTION ORDER
21 Defendant) Date: January 14, 2016
22) Time: 1:30 p.m.
23
24

25 PLEASE TAKE NOTICE that on January 14, 2016 at 1:30 p.m., defendant Adam
26 Shafi will move for review of the magistrate court detention order. [Dkt. 30], which was
27 issued earlier today. The parties have stipulated that the motion for review be made on a
28 shortened schedule, with the defense Motion for Review of the Detention Order to be
29 filed on or before January 8, 2016, and the government opposition to be filed on or before
30 January 12, 2016. *See* L.R. 47-1(a)(3); 47-2(a). The parties agree that the Stipulated
31 STIPULATED MOTION
32 SHORTENING TIME FOR
33 REVIEW OF DETENTION ORDER
34 CR 15-0582 WHO

1 Motion Shortening Time may be granted based on this stipulated motion and the
2 declaration of counsel below, and without oral argument.

3 **Declaration of Counsel**

4 1. Along with Joshua L. Dratel, I represent Mr. Adam Shafi in the above-
5 captioned matter and I submit this declaration in support of Mr. Shafi's Stipulated Motion
6 Shortening Time for Motion for Review of Detention Order. I present the following
7 based on information and belief.

8 2. On July 3, 2015, Mr. Shafi was arrested on a Complaint that alleged an
9 attempt to provide material support to a foreign terrorist organization in violation of 18
10 U.S.C. § 2339B. [Dkt. 1]. The Court ordered the matter sealed, [Dkt. 2], and it remained
11 under seal in its entirety until Mr. Shafi was arraigned on an Indictment December 17,
12 2015. [Dkt. 18].

13 3. On December 22, 2015, the magistrate court conducted a bail hearing and
14 ordered the Mr. Shafi be detained and set the matter for status conference before this
15 Court on January 14, 2106 at 1:30 p.m. [Dkt. 23]. On January 5, 2016, the magistrate
16 court issued its written order detaining Mr. Shafi. [Dkt. 30]. A transcript of the detention
17 hearing has been prepared. [Dkt. 27].

18 4. Mr. Shafi can file his motion for review of the detention order on or before
19 January 8, 2016, and the government has agreed to file its opposition to the motion on or
20 before January 12, 2016.

5. Counsel now seeks an order shortening the time provided in Local Rule 47-2(a) so that the Court can consider the Motion for Review of Detention Order at the status conference scheduled for January 14, 2016 at 1:30 p.m.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 5th day of January, 2016, at Berkeley, California.

s/ Erik B. Levin
Erik B. Levin

SO STIPULATED.

DATED: 1/5/16

BRIAN STRETCH

Acting United States Attorney

s/ Jeffrey Shih
Jeffrey Shih, Esq.
Assistant United States Attorney

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: January 6, 2016

W. H. Orrick
JUDGE WILLIAM H. ORRICK